

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**DECLARATION OF MIRANDA HATCH  
IN SUPPORT OF THE DEBTORS' MOTION  
TO ESTIMATE DCG'S COUNTERCLAIM AGAINST THE  
DEBTORS UNDER BANKRUPTCY CODE SECTIONS 502(c) AND 105(a)**

I, Miranda Hatch, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am an associate at the law firm Cleary Gottlieb Steen & Hamilton LLP, counsel to the Debtors in the above-captioned chapter 11 case.

2. I respectfully submit this declaration in support of the Debtors' *Motion to Estimate DCG's Counterclaim Against the Debtors Under Bankruptcy Code Sections 502(c) and 105(a)* (the "Motion").<sup>2</sup>

3. A true and correct copy of the email from Mike Katz, Director of Legal and Regulatory at DCG, to [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number as applicable, are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 175 Greenwich Street, Floor 38, New York, NY 10007.

<sup>2</sup> Capitalized terms used, but not otherwise defined, herein shall have the meanings set forth in the Motion.

[REDACTED], with the subject line “RE: 3ac info,” dated July 11, 2022, is attached hereto as Exhibit 1.

4. A true and correct copy of the email from Gary Lee, Assistant Controller at DCG, to Ryan Jolly, Associate at DCG, with the subject line “FW: Assignment of NEAR/AVAX,” dated November 28, 2022, is attached hereto as Exhibit 2.

5. A true and correct copy of the document titled “Financial Update, July 2022,” is attached hereto as Exhibit 3.

6. A true and correct copy of the email from Furqaan Siddiqui, Associate at Weil, Gotshal & Manges LLP, to Adam Goldberg, Partner at Latham & Watkins LLP, Brian Rosen, Associate at Latham & Watkins LLP, Brett Neve, Associate at Latham & Watkins LLP, and Nacif Taousse, Associate at Latham & Watkins LLP, with the subject line “FW: DCG/Genesis – 3AC Secured Collateral, dated July 26, 2022, is attached hereto as Exhibit 4.

7. A true and correct copy of the document entitled “Letter from Barry Silbert, Founder & CEO, DCG,” is attached hereto as Exhibit 5.

8. A true and correct copy of the email from Furqaan Siddiqui, Associate at Weil, Gotshal & Manges LLP, to [REDACTED]

[REDACTED], and Ryan Jolly, Associate at DCG, with the subject line “RE: Genesis 3AC – MLA Assignment Agreement (Executed),” dated July 15, 2022, is attached hereto as Exhibit 6.

Dated: April 24, 2024  
New York, New York

Respectfully submitted,

/s/ Miranda Hatch

Miranda Hatch

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*Counsel to the Debtors and  
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**Exhibit 1**

**FILED UNDER SEAL PENDING MOTION TO SEAL**

**Exhibit 2**

**FILED UNDER SEAL PENDING MOTION TO SEAL**

**Exhibit 3**

**FILED UNDER SEAL PENDING MOTION TO SEAL**

**Exhibit 4**

**FILED UNDER SEAL PENDING MOTION TO SEAL**

**Exhibit 5**

**FILED UNDER SEAL PENDING MOTION TO SEAL**



**Exhibit 6**

**FILED UNDER SEAL PENDING MOTION TO SEAL**